

1 Whitney C. Wilcher, Esq.
2 The Wilcher Firm
3 Nevada State Bar No. 7212
4 8465 West Sahara Avenue Suite 111-236
5 Las Vegas, NV 89117
6 Email: wcw@nevadaada.com
7 Attorney for Plaintiff

5 Lynn V. Rivera, Nevada Bar No. 6797
6 BURNHAM BROWN
7 200 S. Virginia Street, 8th Floor
8 Reno, Nevada 89501
Telephone: (775) 398-3065
Fax: (877) 648-5288
Email: lrivera@burnhambrown.com

9 Attorneys for Defendant
STARBUCKS CORPORATION

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

12 || Kevin Zimmerman, an individual,

No. 17-cv-00596

13 Plaintiff,

**STIPULATION TO EXTEND TIME TO
RESPOND TO PLAINTIFF'S
COMPLAINT; ~~[PROPOSED]~~ ORDER**

15 |

vs.

16 Starbucks Corporation,

Defendant.

1 Plaintiff KEVIN ZIMMERMAN (“Plaintiff”) and Defendant STARBUCKS
2 CORPORATION (“Defendant”) (collectively, the “Parties”), through their counsel of record,
3 HEREBY STIPULATE and agree that Defendant’s deadline to respond to the Complaint in the
4 instant matter is extended to **July 31, 2017**.

5 This action is one of seven actions currently pending in this District in which Plaintiff
6 alleges denial of access at a Starbucks store. Those actions are: 17-cv-00976, 17-cv-00833, 17-
7 cv-00596, 17-cv-00834, 17-cv-00312, 17-cv-01201, and 17-cv-01338.

8 In each of these seven actions, the Parties are represented by the same counsel, and have
9 maintained a cooperative dialogue. In two of these actions, Defendant previously agreed to
10 waive service of the Complaint, placing Defendant’s responsive pleading deadline at July 17,
11 2017. The Parties then agreed to extend the responsive pleading deadline for all of the
12 remaining cases to that same date. In the interim, Plaintiff made global settlement demands to
13 Defendant, which include these seven actions as well as additional claims which have yet to be
14 filed in court. The Parties’ global settlement discussions are ongoing.

15 The Parties have now agreed to extend the responsive pleading deadline for all seven
16 pending cases to July 31. The Parties believe this extension is appropriate under the
17 circumstances, in order to permit the Parties to continue exploring a good faith, global resolution
18 prior to commencing further litigation to which the Parties and the Court would be required to
19 devote time and resources. Good cause exists for this extension, and the Parties respectfully
20 request that it be approved by the Court.

21 DATED: July 7, 2017

/s/ Whitney C. Wilcher, Esq.

22 Whitney C. Wilcher, Esq.

23 The Wilcher Firm

24 8465 West Sahara Avenue Suite 111-236

25 Las Vegas, NV 89117

26 702-466-1959

27 Email: wcw@nevadaada.com

28 *Attorney for Plaintiff*

1 DATED: July 7, 2017

BURNHAM BROWN

2 */s/ Lynn V. Rivera*

3 Lynn V. Rivera
4 Attorneys for Defendant
STARBUCKS CORPORATION

5

6 **[PROPOSED] ORDER GRANTING STIPULATION**

7 Upon consideration of the Stipulation of Plaintiff KEVIN ZIMMERMAN (“Plaintiff”)
8 and Defendant STARBUCKS CORPORATION (“Defendant”) (collectively, the “Parties”), and
9 good cause appearing, the Court hereby orders as follows: Defendant’s responsive pleading is
10 due on or before **July 31, 2017**.

11

12

13 IT IS SO ORDERED:

14 
15 UNITED STATES MAGISTRATE JUDGE

16 DATED: July 11, 2017

17

18 4839-1629-1403, v. 1

19
20
21
22
23
24
25
26
27
28